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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR
IDENTIFICATION OF MOTIONS IN
LIMINE FOR RESOLUTION PRIOR
TO TRIAL AND EXHIBITS
THERE TO**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Portions of Their Identification of Motions In Limine for Resolution Prior to Trial and Exhibits Thereto.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Identification of Motions In Limine for Resolution Prior to Trial ("Brief")	Highlighted Portions	Defendants
Exhibit 3	Entire Document	Defendants
Exhibit 5	Entire Document	Defendants
Exhibit 6	Entire Document	Defendants
Exhibit 7	Highlighted Portions	Defendants

3. The highlighted portions on page 6 of the Brief contain highly confidential information regarding Uber's LiDAR development and business strategy. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that this information could be used by competitors to Uber's detriment to gain an advantage over Uber; for example, disclosure of this information, which contains Uber's internal development timeline estimate, would allow competitors to understand Uber's LiDAR development and business strategy, and allow them to tailor their own strategy. If such information were made public, I understand Uber's competitive standing could be significantly harmed.

4. The entireties of Exhibits 3, 5, 6 are Equity Incentive Plans containing Defendants' highly confidential and sensitive business information regarding financial, compensation, and

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ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: July 10, 2017

/s/ Arturo J. González
Arturo J. González